



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 16 2017

OFFICE OF
AIR AND RADIATION

The Honorable Duncan L. Hunter
U.S. House of Representatives
Washington, D.C. 20515

Dear Congressman Hunter:

Thank you for your letter of June 29, 2017, to the U.S. Environmental Protection Agency regarding the North American Emission Control Area (ECA).

In this response and the enclosure, I am providing some background and information regarding the ECA. I am aware that this is an issue that you and other members of the Coast Guard and Maritime Transportation Subcommittee have an active interest in. EPA staff stand ready to continue discussions with you and your staff, or with any stakeholders you are hearing from.

The North American ECA and the fuel requirements for ships operating within it are treaty requirements. ECAs are designated by the amendment to Annex VI of the International Convention for the Prevention of Pollution from Ships (MARPOL). MARPOL is an international treaty established by the members of the International Maritime Organization (IMO). These requirements were adopted at IMO with support from the United States, including input gathered by the U.S. Coast Guard and EPA through a public process.

Clean marine fuel requirements went into effect in 2012 and 2015. The rules required ships to use low-sulfur fuels while they operate in the North American ECA, which extends 200 nautical miles from the United States' coastline in most areas. The U.S. proposal to designate the North American ECA, which established the fuel sulfur standards, was the subject of a significant and comprehensive analysis of the impacts of ship emissions on U.S. air quality. The analysis included extensive inventory and air quality modeling based on state-of-the-art science and peer reviewed methods. The enclosure to this letter includes additional information on EPA's analysis, along with an analysis of the study that you reference in your incoming letter.

Using the technology research and trial provision in MARPOL Annex VI, EPA and the U.S. Coast Guard have worked with several marine companies that requested waivers to develop lower-cost equivalent compliance methods (e.g., different types of emission scrubbing technology as well as the adaptation of LNG solutions to the marine environment). Most of these projects were begun soon after the entry into force of the North American ECA, in 2012, and now are completed or will soon be completed. The Agency has encouraged these technology development programs, and the entire industry will benefit from the efforts of these early movers.

Again, thank you for your letter. If you have further questions, please contact Aaron Ringel, Deputy Associate Administrator of the Office of Congressional Affairs at 202-564-4373 or your staff may contact Patricia Haman in the EPA's Office of Congressional and Intergovernmental Relations at haman.patricia@epa.gov or (202) 564-2806.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sarah Dunham', with a long horizontal flourish extending to the right.

Sarah Dunham
Acting Assistant Administrator

Enclosure